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Attorney for Plaintiffs PAUL MOTEKAITIS and
CARRI MANGELLI KNEASS

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

PAUL MOTEKAITIS, an individual; and
CARRI MANGELLI KNEASS, an individual.

Plaintiffs,

vs.

USI INSURANCE SERVICES NATIONAL,
INC., a North Carolina corporation; JAMES D.
KANE, an individual; KAREN MONDSHINE,
an individual; and DOES 1 to 50, inclusive,

Defendants.

CASE NO.: 3:24-cv-00885-RS

**STIPULATION TO AMEND
PROPOSED CASE SCHEDULE AND
ORDER SETTING INITIAL CASE
SCHEDULE**

WHEREAS, Counsel for Plaintiffs Paul Motekaitis and Carri Mangelli Kneass, and counsel for Defendants USI Insurance Services, LLC (erroneously sued as USI Insurance Services National, Inc.), James P. Kane (erroneously sued as James D. Kane), and Karen Mondshine (collectively, the “Parties”) previously proposed a case schedule in the Parties’ Joint Case Management Statement filed on May 9, 2024;

WHEREAS, the Court has not issued an initial case scheduling order in this case and no dates have been set;

WHEREAS, the Parties have met and conferred and wish to amend the previously proposed case schedule;

NOW, THEREFORE, the Parties stipulate and propose that the Court adopt the following schedule as its initial case scheduling order.

Deadline for Amended Pleadings:	August 15, 2024
Close of Non-Expert Discovery:	March 3, 2025
Deadline to File Dispositive Motions:	April 7, 2025
Expert Disclosure:	June 9, 2025
Rebuttal Expert Disclosure:	June 30, 2025
Close of Expert Discovery:	July 31, 2025
Pretrial Conference Statement:	September 10, 2025
Pretrial Conference:	September 24, 2025
Trial:	October 6, 2025

Dated: July 1, 2024

ALLEN MATKINS LECK GAMBLE
MALLORY & NATSIS LLP

By: /s/ Baldwin J. Lee
BALDWIN J. LEE
Attorneys for Defendants
USI Insurance Services, LLC; James P.
Kane; and Karen Mondshine

Dated: July 1, 2024

LAW OFFICES OF FULVIO F. CAJINA

By: /s/ Fulvio F. Cajina
FULVIO F. CAJINA
Attorneys for Plaintiffs
Paul Motekaitis and Carri Mangelli Kneass

ORDER

Based on the parties' stipulation, and with good cause appearing therefor, IT IS HEREBY ORDERED that the Parties' initial case scheduling order shall be:

Deadline for Amended Pleadings:	August 15, 2024
Close of Non-Expert Discovery:	March 3, 2025
Deadline to File Dispositive Motions:	April 7, 2025
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Trial:	October 6, 2025

IT IS SO ORDERED.

Dated: July 1, 2024



Hon. Richard Seeborg